

1 Nancy Weng, Esq.
2 Tsao-Wu & Yee, LLP
3 99 N. 1st Street, Suite #200
4 San Jose, CA 95113
(408) 635-2334 (tel)
(415) 777-2298 (fax)
nweng@tsaoyee.com

5 Attorney for Debtor

6
7
8 IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 In re: Case No. 10-59396
Chapter 7

10 Majid Marhamat

11 NOTICE OF MOTION TO AVOID JUDICIAL
12 LIEN UNDER 11 U.S.C. §522 (f)(1)(A) AND OF
OPPORTUNITY TO REQUEST HEARING
(Lawrence Wu and Melea Men)

13 NOTICE IS HEREBY GIVEN that the debtor(s) have filed herewith a MOTION TO
14 AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A) (Lawrence Wu and Melea Men).
15 You are notified that, pursuant to Bankruptcy Rule 2002, you are given twenty-one (21) days
from the date of mailing of this notice to request a hearing on this Application. Such a request
shall be filed with the Clerk of the U.S. Bankruptcy Court at the following address:

16 Clerk of the
17 U. S. Bankruptcy Court
280 South First Street, Room 3035
18 San Jose, CA 95113-3099

19 **Bankruptcy Local Rule 9014-1 of the United States Bankruptcy Court for the**
20 **Northern District of California prescribes the procedures to be followed and any objection**
21 **to the requested relief, or a request for hearing on the matter must be filed and served**
22 **upon the requesting party within 21 days of mailing of the notice;**

23 **A request for a hearing or objection must be accompanied by any declarations or**
24 **memoranda of law the party objecting or requesting wishes to present in support of its**
25 **position;**

26 **If there is not a timely objection to the requested relief or a request for hearing, the**
27 **court may enter an order granting the relief by default; and**

28 **The initiating party will give either (1) at least 10 days written notice of hearing to**
the objecting or requesting party, and to any trustee or committee appointed in the case, in
the event an objection or request for hearing is timely made, or (2) at least 10 days written
notice of the tentative hearing date.

Dated: August 21, 2017

/s/ Nancy Weng
Nancy Weng, Esq.
Attorney for Petitioner/Debtor

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

I am over the age of eighteen years, and not a party to this action and my office address is 99 N. 1st Street, Suite #200, San Jose, CA 95113.

- 1. NOTICE OF MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A) AND OF OPPORTUNITY TO REQUEST HEARING (Lawrence Wu and Melea Men);**
- 2. MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A) AND OF OPPORTUNITY TO REQUEST HEARING (Lawrence Wu and Melea Men); and**
- 3. DECLARATION OF MAJID MARHAMAT, DEBTOR, IN SUPPORT OF MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. §522 (f)(1)(A) (Lawrence Wu and Melea Men)**

Lawrence Wu and Melea Men
c/o Stephen R. Oliver
Oliver & Stephenson
2176 The Alameda
San Jose, CA 95126

Mohamed Poonja mpoonja@sbcglobal.net, mpoonja@ecf.epiqsystems.com

/s/ Steve Kolkey
Steve Kolkey